

KAEMPFER CROWELL
Robert McCoy, No. 9121
Sihomara L. Graves, No. 13239
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Telephone: (702) 792-7000
Facsimile: (702) 796-7181
Email: rmccoy@kcnvlaw.com
Email: sgraves@kcnvlaw.com

Attorneys for Defendants American
Express National Bank

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MA OLIVIA ABAD,

Plaintiff

vs.

EQUIFAX INFORMATION SERVICES
LLC; EXPERIAN INFORMATION
SOLUTIONS, INC.; JPMORGAN
CHASE BANK, N.A.; CITIBANK,
N.A.; SYNCHRONY FINANCIAL;
CAPITAL ONE BANK, NATIONAL
ASSOCIATION; BANK OF AMERICA
CORPORATION; AMERICAN
EXPRESS, INC.; and DISCOVERY
BANK,

Defendants

Case No. 2:25-cv-00090-CDS-NJK

**Order Approving
STIPULATION TO
VACATE DEFAULT**

[ECF No. 57]

Plaintiff Ma Olivia Abad and American Express National Bank,
erroneously sued as American Express, Inc. (“American Express”), stipulate to
following:

1. That the Clerk’s entry of default of American Express (ECF
No. 54) be set aside;

2. That plaintiff's motion for entry of default as to American Express (ECF No. 52) be withdrawn; and

3. That American Express be given 30 days from entry of the order on this stipulation to respond to the complaint (ECF No. 1).

The parties make this stipulate to avoid the time and expense of litigating a dispute over whether American Express was properly served in this action. The parties agree that Fed. R. Civ. P. 1's goal of a "just, speedy, and inexpensive determination of every action and proceeding" is best met by permitting American Express to appear and respond on the merits.

FREEDOM LAW FIRM, LLC

KAEMPFER CROWELL

/s/ Gerardo Avalos

George Haines, No. 9411
Gerardo Avalos, No. 15171
8985 S. Eastern Avenue, Suite 100
Las Vegas, Nevada 89123

Attorneys for Plaintiff
Ma Olivia Abad



Robert McCoy, No. 9121
Sihomara L. Graves, No. 13239
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135

Attorneys for Defendants American
Express National Bank

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: July 15, 2025